Tank Closure Checklist

Tank Number: _____

Note: This checklist is intended as a guide only. Contact the Tank Assessments and Guidance Group (TAG specific and current requirements and procedures.

Tank Closure Preparation

❑ For hazardous and mixed waste retention tanks, begin tank closure procedures 180 days before last use.

❑ Note the "approval" date on the Closure Plan; regulatory approval is valid for only 90 days from that date. I approval has expired, review the Closure Plan for any items that need to be updated. Contact the regulatory and inform them of any changes to the Closure Plan due to the delay and request an extension on their appro

Approval date: _____

❑ Contact TAGG so that the appropriate regulatory agency can be contacted at least two working days (48 hou tank removal. If the tank is in an Exclusion Area, notify the regulatory agency five days in advance so that, regulatory agency inspection is necessary, security arrangements for the inspector can be made. For the Liv site, the Bay Area Air Quality Management District must also be notified five days in advance if the tank ha contained gasoline or other volatile organic material.

❑ Inform the Hazardous Waste Management (HWM) Division Shipping Supervisor that the tank removal will Ensure that any participation from the HWM Division is clearly understood by both HWM and Operations an Regulatory Affairs Division (ORAD).

❑ Inform the Environmental, Safety, and Health (ES&H) Team Leader of the tank removal project. Specify th schedule for activities and the type of waste/product material involved. The responsible Environmental Anal Program representative is the lead for arranging for disposal of waste.

❑ View the video tapes, "Tank Closure Without Tears" and "What Do We Have Here? An Inspector's Guide Assessment at Tank Closure," which can be found in the ORAD library. These video

s need to be reviewed prior to tank closure.

❑ Fill out a Sample Requisition form and give to the technician who will do the sampling two to three weeks b tank closure begins. Inform the technician when work begins and when sampling is expected. Find out from Program and let the technician know if the sample analyses will be on a rush order.

❑ The location of all underground utility, gas, and water lines must be marked with chalk or an environmentall spray paint. Do not rely on the site plot for the location of all underground utilities. Use an underground line service, which is normally contracted through Plant Engineering. Line locating should be scheduled at the ti Closure Plan is submitted to the regulatory agency for approval.

Tank Closure Activity

❑ Identify who is responsible for the excavation and removal work (i.e., Plant Engineering Labor Shop foreman done by LLNL; Plant Engineering Project Manager or Construction Manager if work done by outside contrac

❑ Just before work to remove the tank system is scheduled to begin, conduct a pre-closure meeting to go over t requirements of the Closure Plan and the responsibilities of the people involved (e.g., identify who is the des safety person), highlight the requirement to place soil piles on plastic, and cover piles and excavations with there is possibility of rain, make sure workers have Superfund Amendments and Reauthorization Act of 1986 Occupational Safety and Health Act (SARA/OSHA) training, etc.

❑ A copy of the "approved" Closure Plan must be at the job site. The Closure Plan is the official document by closure activities are dictated. Any significant deviations from the "approved" Closure Plan must be approv Tank Closure Coordinator and possibly by the TAGG Group Leader or ERD Group Leader.

❑ Verify that the required personnel (including field personnel) have read and understand the Closure Plan. Ob necessary signatures on the Closure Plan Sign-Off Sheet.

❑ If possible, remove all liquid and sludge from the tank and piping prior to disconnecting any pipes or excava sure that any residual liquid in exposed pipes is prevented from escaping or is contained and not permitted to the surrounding soil.

❑ All required safety equipment must be available and used, such as safety shoes, hard hat, etc.

❑ Samples must be from locations specified in the "approved" Closure Plan. The samples must be prepared an analyzed using the methods specified in the "approved" Closure Plan. If the physical conditions of the site p obtaining samples from the prescribed locations, the samples will be taken from as near as possible to the pr locations. The new sample locations and the physical conditions causing the relocation will be fully describ bound field notebook.

❑ Make sure that the excavation and excavated soil pile are covered with plastic and that the soil pile is place plastic. If more than one hole is being excavated for multiple tanks, make sure that the soil for each excava separate.

❑ Record the Hazardous Waste Manifest numbers and/or the Hazardous Waste Disposal Requisition numbers u dispose of the tank, piping, liquid or solid residue from the tank, contaminated soil, etc.

Tank Manifest # _____

Liquid Manifest # _____

Soil Manifest # _____

❑ Inform the HWM Division Shipping Supervisor when the tank removal is completed and the need to dispose 30 days; request the TSD-to-Generator copies of the waste manifest for (1) the tank and associated piping, (2 rinsate and sludge, and (3) any contaminated soil.

❑ While awaiting disposal or reuse, the removed tank must be vented (1/8-inch vent hole) to relieve pressures by temperature fluctuations. Ensure that the vent plug is always on the tank top.

❑ Tanks should be labeled with legible letters, at least 2 inches high, indicating former tank contents, vapor st freeing treatment, and date.

❑ For tanks at Site 300, affix the San Joaquin County tank ID# onto the tank end using fluorescent spray paint. San Joaquin County Tracking Sheet must accompany each tank removed from the site. The Tracking Sheet found in the Closure Plan. (The Tracking Sheet is in addition to a waste manifest.)

❑ If an unexpected/unknown leak or spill is detected, immediately notify TAGG so that decisions can be made (1) the reporting of the leak to the regulatory agency, (2) any additional sampling that may be necessary, an disposal of contaminated material.

Tank Closure Follow-Up

❑ Obtain lab analysis results from the sampling technician and make sure that all results are signed by the lab

❑ Make sure that all data requested for the samples have been provided and that proper/requested analysis tecl were used (e.g., correct EPA analysis numbers, holding times not exceeded, etc.). Also make sure that Chai Custody forms are included with the analysis results and that proper transfer procedures were followed.

❑ Make sure that the responsible Environmental Operations Group (EOG) Environmental Analyst also reviews analysis results and comes to the same conclusions regarding presence of soil contamination.

❑ Keep the Program informed of the progress of the closure at all times. All communications should go throug responsible Environmental Analyst when notifying the Program of progress or problems.

❑ Obtain copies of the TSD-to-Generator copy of the Hazardous Waste Manifest for the tank, piping, liquid, so from the HWM Division to be included in the Closure Report.

❑ Prepare and submit a Closure Report necessary to the regulatory agency.